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1 UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
2 JACKSONVILLE DIVISION
CASE NO. 3:04-CV-146-99HTS

3 - - -

SEA STAR LINE, LLC, :
4 a limited liability :
company, :
5 Plaintiff, :

6 vs. :

EMERALD EQUIPMENT :
7 LEASING, INC., a :
8 corporation :
Defendant. :

9 - - -

10 January 26, 2005

11 - - -

12 Oral deposition of LORRAINE
T. ROBINS, held in the offices of
13 Adelman, Lavine, Gold and Levin, Suite
900, Four Penn Center, Philadelphia,
14 Pennsylvania 19103, commencing at 9:30
a.m., on the above date, before Pamela J.
15 Gober Bracic, a Federally-Approved
Registered Professional Reporter and
16 Commissioner for the Commonwealth of
Pennsylvania.

17 - - -

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21
22 ESQUIRE DEPOSITION SERVICES
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2

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ESQUIRE DEPOSITION SERVICES

3

1 - - -

2 INDEX

3 WITNESS PAGE NO.

4 LORRAINE T. ROBINS

5 By Mr. Armstrong 6

6 - - -

7 EXHIBITS

8 NO. DESCRIPTION PAGE NO.

9 1 Schedule DV 20 76

10 2 5/13/02 E-mail 96

11 3 5/13/02 E-mail 98

12 4 6/26/02 E-mail 102

13 5 7/12/02 E-mail 103

14 6 8/15/02 Letter 105

15 7 9/5/02 Fax 106

16 8 10/01/02 E-mail 107

17 9 10/01/02 E-mail 111

18 10 10/02/02 E-mail 112

19 11 11/08/02 E-mail 114

20 12 1/29/03 E-mails 116

21 13 3/03/03 Fax 119

22 14 3/05/03 E-mail 123

23 15 3/10/03 E-mail 128

24 16 3/25/03 E-mail 129

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ESQUIRE DEPOSITION SERVICES

4

1 - - -

2 EXHIBITS

3 NO. DESCRIPTION PAGE NO.

4 17 3/27/03 E-mail 130

5 18 5/22/03 E-mail 132

6 19 9/15/03 E-mail 135

7 20 9/16/03 E-mail 138

8 21 9/16/03 E-mail 143

9 22 9/22/03 E-mail 144

10 23 12/16/03 E-mail 155

11 - - -

12

13

14

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16

17

18

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24

ESQUIRE DEPOSITION SERVICES

A-782

5

1 DEPOSITION SUPPORT INDEX

2

Direction to Witness Not To Answer

3 Page Line Page Line

(None)

4

5

6

7

Request For Production of Documents

8 Page Line Page Line

(None)

9

10

11

Stipulations

12 Page Line Page Line

5 2-8

13

14

15

Questions Marked

16 Page Line Page Line

(None)

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ESQUIRE DEPOSITION SERVICES

A-783

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1 - - -

2 (It is hereby stipulated and
3 agreed by and between counsel that
4 the sealing, filing and
5 certification are waived; and that
6 all objections, except as to the
7 form of questions, be reserved
8 until the time of trial.)

9 - - -

10 LORRAINE T. ROBINS, after
11 having been duly sworn, was
12 examined and testified as follows:

13 - - -

14 EXAMINATION

15 - - -

16 MR. MOLDOFF: We will
17 reserve the right to read and sign
18 the transcript.

19 BY MR. ARMSTRONG:

20 Q. Please state your full name.

21 A. Lorraine Robins.

22 Q. What is your residence
23 address?

24 A. 7900 Old York Road,

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7

LORRAINE T. ROBINS

1 apartment 812B, Elkins Park,

2 Pennsylvania.

3 Q. Ms. Robins, have you ever

4 had your deposition taken before?

5 A. Several, several years ago.

6 Q. I'm going to ask you some

7 questions. If you don't understand the

8 question, you can ask me to repeat it or

9 rephrase it.

10 If you want to take a break

11 during this deposition, all you have to

12 say is that you want to take a break and

13 we are under your control. Other than

14 that, your counsel will probably

15 interpose objections from time to time as

16 to form.

17 If there's an objection as

18 to form, then you answer the question.

19 If counsel instructs you not to answer,

20 then of course you do not answer.

21 A. I understand.

22 Q. Do you recall the cases in

23 which you've had your deposition taken?

24 A. No, I really don't. It was,

ESQUIRE DEPOSITION SERVICES

8

LORRAINE T. ROBINS

1 as I said, many, many years ago.

2 Q. And what type of case?

3 A. Maritime.

4 Q. Personal injury?

5 A. No.

6 Q. Cargo?

7 A. No, it wouldn't be cargo.

8 Q. Do you recall what it was?

9 A. It was about shipping,
10 that's all I remember.

11 Q. What is your business
12 address?

13 A. 7900 Old York Road, Suite
14 116A.

15 Q. Where?

16 A. Elkins Park, Pennsylvania.

17 Q. By whom are you employed?

18 A. I'm not employed, I'm
19 retired at this time.

20 Q. When were you last employed?

21 A. June '02.

22 Q. By whom were you last
23 employed?

24 A. Gloucester Terminals, LLC or

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9

LORRAINE T. ROBINS

1 Inc.

2 Q. Where is Gloucester

3 Terminals located?

4 A. Gloucester City, New Jersey.

5 Q. Is there a street address?

6 A. King and Essex Streets.

7 Q. Is that a Holt Company?

8 A. No.

9 MR. MOLDOFF: I object to

10 the question. I don't know

11 whether you know what a Holt

12 Company is.

13 BY MR. ARMSTRONG:

14 Q. Is that a company in which

15 any member of the Holt Company is

16 involved?

17 A. Yes.

18 Q. Who is involved in

19 Gloucester Terminals from the Holt

20 family?

21 A. Leo Holt.

22 Q. How long were you employed

23 by Gloucester Terminals?

24 A. Approximately a year. No,

ESQUIRE DEPOSITION SERVICES

10

LORRAINE T. ROBINS

1 no, wait a minute. I'm not sure. I

2 think it was a year.

3 Q. What was your position?

4 A. At that particular time I

5 didn't have a position. I mean, I wasn't

6 an officer.

7 Q. What were your

8 responsibilities?

9 A. My responsibilities, I was

10 involved in the operations and -- let me

11 think -- and general office.

12 Q. What did you have to do with

13 operations?

14 A. A lot of the customers, I

15 would deal with the customers, any

16 complaints or things that they had.

17 Q. And what did you have to do

18 with the general office?

19 A. With the general office,

20 there was -- sometimes I would help out

21 with the receivables. Various things.

22 Just general.

23 Q. What is your employment

24 history prior to Gloucester Terminals?

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11

LORRAINE T. ROBINS

1 A. I was executive
2 vice-president of the Holt Group, Inc.

3 Q. When did you become
4 executive vice-president of the Holt
5 Group, Inc.?

6 A. When the group was formed?

7 Q. When was the group formed?

8 MR. MOLDOFF: If you know.

9 THE WITNESS: I don't know.

10 It was in the -- I don't know. I

11 would have to look it up.

12 BY MR. ARMSTRONG:

13 Q. Approximately how many years
14 ago was the Holt Group formed?

15 A. The Holt Group was formed --
16 from today?

17 Q. Yes.

18 A. Five.

19 Q. Five years ago?

20 A. Mm-hum, yes.

21 Q. And as executive
22 vice-president, what were your duties and
23 responsibilities?

24 A. I was Tom Holt, Senior's

ESQUIRE DEPOSITION SERVICES

12

LORRAINE T. ROBINS

1 assistant.

2 Q. And what did you do as Tom

3 Holt, Senior's assistant?

4 A. Different operations. I did

5 finance, I did sales.

6 Q. What did you do in

7 operations?

8 A. A lot of coordination.

9 Q. What type of coordination?

10 A. Talking to the managers of

11 the piers, conveying any problems that

12 they would have directly to Tom, Senior,

13 and anything that they came to me with.

14 Q. What did you do in finance?

15 A. I set up a lot of payments

16 for various projects that we had. Also

17 dealt, you know, with meetings with our

18 banks.

19 Q. Anything else?

20 A. No.

21 Q. What did you do in sales?

22 A. Sales, together with Tom, we

23 basically -- all of the container lines.

24 Originally we would do the contracts with

ESQUIRE DEPOSITION SERVICES

13

LORRAINE T. ROBINS

1 the container lines and call on them,
2 which would be -- at that particular time
3 we had about six major lines. And they
4 would deal strictly with Tom or myself.

5 Q. What was the business of the
6 Holt Group, Inc.?

7 A. I'm not exactly sure of the
8 structure of the company. It was
9 formed --

10 MR. MOLDOFF: I think he's
11 asking what did they do, what was
12 their business.

13 THE WITNESS: They were like
14 a holding company, I believe. I
15 don't know.

16 BY MR. ARMSTRONG:

17 Q. How long did you remain
18 executive vice-president of the Holt
19 Group, Inc.?

20 A. Until, I guess, June of '02,
21 June 30, 2002.

22 Q. Why did you leave?

23 A. That was after the company
24 went into Chapter 7.

ESQUIRE DEPOSITION SERVICES

14

LORRAINE T. ROBINS

1 Q. Did you also work for
2 Gloucester Terminals while you were
3 vice-president of the Holt Group, Inc.?

4 A. No, I did not.

5 Q. When did you start working
6 for Gloucester Terminals?

7 A. In July of '02.

8 Q. When did you stop working
9 for Gloucester Terminals?

10 A. I must have had my dates
11 wrong, because I stopped working for them
12 before -- I said '02. I think it was '03
13 that I stopped. I had the wrong time
14 line.

15 Q. What is your employment
16 history prior to becoming executive
17 vice-president of the Holt Group, Inc.?

18 A. Executive vice-president for
19 Holt Cargo Systems, Inc.

20 Q. What is or was Holt Cargo
21 Systems, Inc.?

22 A. Holt Cargo Systems, Inc. was
23 a trucking company, a warehousing company
24 and a stevedoring company.

ESQUIRE DEPOSITION SERVICES

15

LORRAINE T. ROBINS

1 Q. When did you become

2 executive vice-president of Holt Cargo

3 Systems Inc.?

4 A. When the company was formed.

5 Q. When was the company formed?

6 A. I would have to check that

7 date.

8 Q. How long did you remain

9 executive vice-president?

10 A. About 35 years.

11 Q. Do you recall when you ended

12 your executive vice-presidency with Holt

13 Cargo Systems, Inc.?

14 A. No, I do not.

15 Q. As executive vice-president

16 of Holt Cargo Systems, Inc., what were

17 your duties and responsibilities?

18 A. The same as I described

19 before.

20 Q. Operations?

21 A. Mm-hum.

22 Q. What did you do in

23 operations?

24 A. Coordinated with the pier

ESQUIRE DEPOSITION SERVICES

16

LORRAINE T. ROBINS

1 and our customers.

2 Q. What did you do in finance?

3 A. Oversaw the payables. We
4 had a department, but I set up payment
5 structures for certain accounts.

6 Q. What did you do in sales?

7 A. Same as I did before, dealt
8 with the container lines and the fruit,
9 break bulk customers.

10 Q. Holt Cargo Systems, Inc. was
11 involved in trucking, was it not?

12 A. Trucking.

13 Q. And what else?

14 A. Warehousing and stevedoring.

15 Q. As executive vice-president,
16 to whom did you report?

17 A. Thomas Holt, Senior.

18 Q. Prior to becoming executive
19 vice-president of Holt Cargo Systems
20 Inc., what did you do, what was your
21 employment history?

22 A. You take me back 40-some
23 years. Aging me right before my eyes.

24 Q. Look at me.

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17

LORRAINE T. ROBINS

1 A. Before that I worked for
2 Overland Motor Freight, from 1946 to
3 about 1961. And 1961 I went to work for
4 Holt Motor Express they were good times.

5 Q. What did you do with Holt
6 Motor Express?

7 A. Holt Motor Express, I did
8 the billing, I did the dispatching, I
9 coordinated with dispatching and I did
10 the bookkeeping.

11 Q. What --

12 A. And sales.

13 Q. What position did you hold?

14 A. We didn't have a position in
15 that company.

16 Q. How long did you remain with
17 Holt Motor Express?

18 A. From -- 1946 was the wrong
19 date, because I was with Overland first.

20 Q. No, you said that --

21 A. All right.

22 Q. You were with Overland from
23 '46 to '61, I believe.

24 A. No, no, no. If I did I'm

ESQUIRE DEPOSITION SERVICES

18

LORRAINE T. ROBINS

1 wrong. Overland I was with from '46 to

2 '61. Yeah, you are right. That's right.

3 I'm confused. I only had three jobs in

4 my life.

5 Q. You joined Holt Motor

6 Express in 1961?

7 A. 1961, correct.

8 Q. How long did you remain with

9 Holt Motor Express?

10 A. Until the company -- I don't

11 know how the company structure went, but

12 at that time we ended up -- they ended up

13 incorporating the companies. Before,

14 Holt Motor Express was a privately-owned

15 company by Leo Holt. And when Mr. Holt

16 died, they formed a corporation. And the

17 corporation was called Holt Cargo

18 Systems, Inc.

19 So that I've been with the

20 company 35 years, 40 years. No, 35,

21 because the rest was Holt Group, Inc.

22 Q. When Holt Cargo Systems,

23 Inc. was incorporated, did you join Holt

24 Cargo Systems, Inc.?

ESQUIRE DEPOSITION SERVICES

19

LORRAINE T. ROBINS

1 A. Mm-hum.

2 Q. At that time did you become
3 executive vice-president?

4 A. I don't remember. I
5 think -- yes, yes. I don't know whether
6 it was executive or just vice-president.

7 Q. While you have been with any
8 of the Holt Companies, Holt Group, Holt
9 Cargo Systems, Inc., Gloucester
10 Terminals, that's what I am calling the
11 Holt Companies for purposes of this
12 question.

13 A. Well, I don't --

14 Q. Strike the question, I will
15 ask it a different way.

16 A. Yes.

17 Q. While you were with Overland
18 Motor Freight, did you have any
19 responsibilities with respect to
20 equipment?

21 A. Equipment?

22 Q. Yes.

23 A. What do you mean by
24 equipment?

ESQUIRE DEPOSITION SERVICES

20

LORRAINE T. ROBINS

1 Q. Well, buying equipment for
2 the company, selling equipment for the
3 company?

4 MR. MOLDOFF: Are you
5 talking about any equipment?

6 MR. ARMSTRONG: Yes.

7 THE WITNESS: No. I was
8 general office manager.

9 BY MR. ARMSTRONG:

10 Q. While you were with Holt
11 Motor Express, did you have any
12 responsibilities with respect to buying,
13 selling, leasing equipment?

14 A. What kind of equipment are
15 you talking about? That's awfully broad.

16 Q. Trailers, containers,
17 gensets, cargo-moving equipment.

18 A. No, I did not.

19 Q. While you were with Holt
20 Cargo Systems, Inc., did you have any
21 responsibilities with respect to
22 cargo-moving equipment such as trailers,
23 containers, gensets, chassis?

24 A. No.

ESQUIRE DEPOSITION SERVICES

21

LORRAINE T. ROBINS

1 Q. While you were with Holt

2 Group, Inc., did you have any

3 responsibilities with respect to

4 equipment such as trailers, containers,

5 gensets or chassis?

6 A. No.

7 Q. While you were with

8 Gloucester Terminals, Inc., did you have

9 any responsibilities with respect to such

10 equipment?

11 A. No.

12 Q. Have you ever had any

13 responsibilities with respect to

14 equipment such as containers, trailers,

15 gensets or chassis?

16 A. Could you repeat that

17 question, please?

18 - - -

19 (Whereupon, the pertinent

20 portion of the record was read.)

21 - - -

22 THE WITNESS: With

23 Gloucester Terminals?

24 BY MR. ARMSTRONG:

ESQUIRE DEPOSITION SERVICES

22

LORRAINE T. ROBINS

1 Q. With anyone.

2 A. With anyone?

3 MR. MOLDOFF: Up to the
4 present.

5 THE WITNESS: What do you
6 mean by responsibilities?

7 BY MR. ARMSTRONG:

8 Q. Have you ever dealt with
9 buying, selling or leasing trailers,
10 containers, gensets or chassis?

11 A. No.

12 Q. What is your educational
13 background?

14 A. I had two years of college
15 and -- or two years of business school
16 and one year of college.

17 Q. Am I correct in
18 understanding that you retired from
19 Gloucester Terminals in June of 2003?

20 A. Yes.

21 Q. After June 23rd, have you
22 worked?

23 A. Could you define work? I
24 mean what do you mean work?

ESQUIRE DEPOSITION SERVICES

23

LORRAINE T. ROBINS

1 Q. Have you been involved in
2 any business activities?

3 A. I have been assisting and
4 doing the -- I don't know how exactly to
5 explain this. Let me think about this a
6 minute. I have been working to
7 straighten out the billing for Emerald
8 Equipment but this is basically
9 something that Tom Holt, Senior asked me
10 to help him out with. It is a nonpaying
11 job.

12 Q. When did you begin working
13 to straighten out the billing for Emerald
14 Equipment?

15 A. I began working doing that,
16 I would say, late in '02.

17 Q. Are you still working to
18 straighten out the billing for Emerald
19 Equipment?

20 A. I could spend a lifetime
21 doing it.

22 Q. Are you still doing it?

23 A. Yes, I am.

24 MR. MOLDOFF: Off the

ESQUIRE DEPOSITION SERVICES

24

LORRAINE T. ROBINS

1 record.

2 - - -

3 (Whereupon, a discussion was

4 held off the record.)

5 - - -

6 BY MR. ARMSTRONG:

7 Q. Did Tom Holt, Senior contact

8 you in connection with this project in

9 late '02?

10 A. I don't know exactly how it

11 came about. I think that -- I'm not sure

12 how it came about.

13 Q. What --

14 A. But I did it as a favor to

15 him.

16 Q. Have you ever been paid in

17 connection with your work in regard to

18 straightening up the billing for Emerald

19 Equipment?

20 A. No.

21 Q. Have you ever received any

22 money from Holt Logistics?

23 A. No.

24 Q. Have you ever received any

ESQUIRE DEPOSITION SERVICES

25

LORRAINE T. ROBINS

1 money from MBC Leasing in connection with
2 this project?

3 A. No.

4 Q. When you were approached,
5 were you given any instructions?

6 A. No.

7 Q. Have you ever been given any
8 instructions in regard to straightening
9 out the billing for Emerald Equipment?

10 A. No.

11 Q. Have you ever been involved
12 with NPR Holding Corp. in any capacity?

13 A. When I was with Holt Group,
14 Inc., yes. NPR, I don't know whether
15 it's all the same. I don't know what
16 they were called.

17 Q. When you say "they," what do
18 you mean?

19 A. NPR I was involved with.

20 Q. How were you involved with
21 NPR?

22 A. I was involved with their
23 trucking -- I was involved with their
24 finance. Their accounts payable system

ESQUIRE DEPOSITION SERVICES

26

LORRAINE T. ROBINS

1 was subcontracted out to a company in
2 Phoenix, Arizona. And we started having
3 a lot of problems with nonpayment of
4 bills, so we brought -- NPR/Holt/Holt
5 Logistics to do their accounts payable,
6 and I dealt with the truckers trying to
7 get the truckers straightened out. They
8 had bills -- I reconciled their accounts,
9 the truckers. I dealt mainly with the
10 truckers.

11 Q. Have you had any other
12 involvement with NPR?

13 A. What do you mean by
14 involvement?

15 Q. Have you done any work or
16 performed any business activities related
17 to NPR?

18 A. Just what would be required
19 of me as the executive vice-president of
20 Holt holding companies, Holt Group, Inc.

21 Q. And do you recall what was
22 required of you?

23 A. No. I was just very
24 involved in this situation with

ESQUIRE DEPOSITION SERVICES

27

LORRAINE T. ROBINS

1 straightening out the truckers.

2 Q. Have you ever performed any

3 work or been involved in business

4 activities related to Greenwich

5 Terminals?

6 A. No.

7 Q. Do you know what Greenwich

8 Terminals is?

9 A. Greenwich Terminals, I

10 believe, is the operator of Packer Avenue

11 Marine Terminal.

12 Q. Have you had any

13 communications with anyone from Greenwich

14 Terminals in connection with Emerald

15 Equipment?

16 A. Yes, I have. A couple times

17 I had to check some TIR information with

18 the clerks. The clerks would be the ILA

19 clerks at the pier.

20 Q. Why would you check TIR

21 information with a clerk at the pier?

22 A. Because I would need a copy

23 or something like that.

24 Q. Are the clerks at the pier

ESQUIRE DEPOSITION SERVICES

28

LORRAINE T. ROBINS

1 the ones who keep the TIRs?

2 A. Well, the TIRs, when they
3 come in, the trucker gets one, the
4 customer -- I think and the -- they
5 electronically do most of the work there.
6 Then they file. They used to give them
7 copies, but now it's practically all
8 electronic.

9 Q. Are you talking about
10 Greenwich being electronic?

11 A. No. I'm talking about --
12 Greenwich is electronic. I'm talking
13 about your Maersk Lines, Blue Star Lines,
14 PAO. These are steamship lines. They
15 were all electronic. And all the
16 information with the TIRs goes to them
17 automatically. I think something like
18 every 15 minutes.

19 Q. Do you know when this
20 started, this electronic transfer of
21 information?

22 MR. MOLDOFF: Where are we
23 talking about?

24 MR. MOLDOFF: At Greenwich.

ESQUIRE DEPOSITION SERVICES

29

LORRAINE T. ROBINS

1 THE WITNESS: From the time

2 they went in business.

3 BY MR. ARMSTRONG:

4 Q. When did Greenwich go into

5 business?

6 A. I don't know.

7 Q. Do you know the approximate

8 date, the year?

9 A. I don't want to venture a

10 guess.

11 Q. While you were with Holt

12 Group, did you work with Arthur Davis?

13 A. Yes, I did.

14 Q. When did you begin working

15 with Arthur Davis?

16 A. Arthur Davis worked for Holt

17 Logistics. And I guess I started --

18 well, prior to that. When he was with

19 Holt Logistics, he came in when the

20 treasurer for NPR -- when they moved the

21 accounts payable down to Holt Logistics,

22 the treasurer didn't come, and Arthur

23 took over his job. He was dealing with

24 accounts payable. So I dealt with him

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30

LORRAINE T. ROBINS

1 about the payment of the truckers.

2 Q. Who was the NPR treasurer?

3 A. Vince -- I don't think of

4 his last name. I'm sorry, I forget his

5 last name. I don't remember his last

6 name.

7 Q. Had you worked with Arthur

8 Davis before that?

9 A. Yes, I worked with him

10 before that. He worked for the Holt

11 Companies for quite a number of years, so

12 we crossed paths all the time.

13 Q. What positions did he hold

14 with the Holt Companies?

15 A. He held maintenance,

16 construction positions. Accounting he

17 did. He originally started out doing

18 accounting. Then he did construction,

19 maintenance, leasing. When he went to

20 NPR, I know he was doing leasing.

21 Q. When did he begin working

22 for NPR?

23 A. Whenever Holt Logistics was

24 engaged by NPR to do their accounting or

ESQUIRE DEPOSITION SERVICES

31

LORRAINE T. ROBINS

1 whatever.

2 Q. Do you know how long he

3 remained with NPR?

4 MR. MOLDOFF: Objection to

5 form.

6 THE WITNESS: He didn't work

7 for NPR.

8 BY MR. ARMSTRONG:

9 Q. He took over the NPR

10 treasurer's job?

11 A. No, no, I did not say he

12 took over -- I said Holt Logistics put

13 him in there for the treasurer. That's a

14 little bit different.

15 Q. When Holt Logistics put him

16 in there for the treasurer --

17 A. No, to do the treasurer's

18 job.

19 Q. To do the treasurer's job?

20 A. Right.

21 Q. What was that job?

22 A. What does a treasurer do?

23 He manages money, he sets up payment of

24 the bills and he did oversee the accounts

ESQUIRE DEPOSITION SERVICES

32

LORRAINE T. ROBINS

1 payable department.

2 Q. Did he oversee equipment

3 leasing by NPR?

4 A. What he did is, he was

5 responsible for the payments to the

6 various leases that NPR had, such as with

7 Interpool and whatever other ones they

8 may have had, with Emerald. That's where

9 he was familiar with the leasing.

10 Q. Was he responsible for

11 inventories of equipment that NPR had?

12 A. I would not know the answer

13 to that.

14 Q. Do you know how long Arthur

15 Davis remained in the treasurer's job or

16 the NPR treasurer's job?

17 MR. MOLDOFF: While he was

18 working --

19 BY MR. ARMSTRONG:

20 Q. That he had taken over.

21 A. He wasn't the treasurer.

22 Q. I understand.

23 A. All right. But the way you

24 were putting the question to me sounds

ESQUIRE DEPOSITION SERVICES

33

LORRAINE T. ROBINS

1 like he had the treasurer's job. He had
2 the treasure's duties, but he didn't have
3 his job.

4 Q. Do you know how long Arthur
5 Davis had --

6 A. I don't know when it began,
7 but I know that it was until the end --
8 until April 26th. I don't know when it
9 started.

10 Q. Of what year?

11 A. '02.

12 Q. Why did it end on April 26,
13 '02?

14 A. The company was sold to Sea
15 Star Line.

16 Q. What company?

17 A. NPR.

18 Q. Were you involved at all in
19 the sale of NPR assets to Sea Star Line?

20 A. No.

21 Q. Did you handle
22 communications on behalf of Tom Holt,
23 Senior, in connection with the sale of
24 NPR assets to Sea Star Line?

ESQUIRE DEPOSITION SERVICES

34

LORRAINE T. ROBINS

1 A. No.

2 Q. Do you know Bob Magee?

3 A. No.

4 Q. Have you ever spoken with

5 Bob Magee?

6 A. No.

7 Q. Do you know Brian Bogen?

8 A. No.

9 Q. Do you recall speaking with

10 Brian Bogen?

11 A. No.

12 Q. Do you know Mike Shea?

13 A. Yes.

14 Q. How do you know Mike Shea?

15 A. I knew Mike Shea from --

16 prior to his going with Sea Star Line,

17 from the industry.

18 Q. In what connection did you

19 know Mike Shea from the industry?

20 A. He worked for one of our

21 clients. I cannot recall who it was.

22 And that's how I knew him.

23 Q. Did you have any

24 communications with Mike Shea while he

ESQUIRE DEPOSITION SERVICES

35

LORRAINE T. ROBINS

1 was with Sea Star Line?

2 A. Just hello and good-bye when

3 they were in Gloucester.

4 Q. Do you know Phil Bates?

5 A. Met him, also, once in

6 Gloucester.

7 Q. Do you have any

8 communications with Phil Bates?

9 A. No.

10 Q. Do you know Bob Leach?

11 A. Yes. Again, they were all

12 in Gloucester during the week or so

13 before the sale was finalized.

14 Q. When you say "they were

15 all," who do you mean?

16 A. I meant Phil Bates, Mike

17 Shea, Bob Leach and some other people

18 that I didn't meet.

19 Q. Do you know why they were in

20 Gloucester?

21 A. Yes. They were doing -- I

22 know they were in there because of the

23 sale. I imagine they were doing a due

24 diligence. I don't know.

ESQUIRE DEPOSITION SERVICES

36

LORRAINE T. ROBINS

1 Q. Did you have any
2 responsibilities in connection with the
3 due diligence?

4 A. No.

5 Q. Did you communicate with Bob
6 Leach in connection with the due
7 diligence?

8 A. No.

9 Q. Do you recall communicating
10 with any representatives of Sea Star Line
11 in connection with the due diligence?

12 A. No.

13 Q. When you were asked to begin
14 working to straighten out the billing for
15 Emerald Equipment, was anyone else
16 involved in that project?

17 A. Arthur Davis.

18 Q. What was Arthur Davis'
19 involvement?

20 A. Arthur Davis had noticed the
21 discrepancy in the bills. I guess -- he
22 went to Tom Holt to point them out, and
23 that's when Tom asked me if I would get
24 involved and check it.

ESQUIRE DEPOSITION SERVICES

37

LORRAINE T. ROBINS

1 Q. Did he tell you what he
2 wanted you to do?

3 A. No.

4 Q. Do you have any specific
5 duties in connection with this project?

6 A. Which project?

7 Q. The straightening out of the
8 billing for the Emerald equipment.

9 A. Yeah. Yes, I do.

10 Q. What specific duties do you
11 have in connection with straightening out
12 the billing for Emerald Equipment?

13 A. Well, one, I do the billing.

14 Q. Anything else?

15 A. Well, I started out with
16 their self-billing reports. And once I
17 took them and put them on a spreadsheet,
18 I started finding lots of errors. And
19 from there I continued to bill.

20 Q. How did you determine that
21 there were errors in the self-billing
22 reports?

23 A. I would -- well, let me
24 explain to you how I did it and that will

ESQUIRE DEPOSITION SERVICES

38

LORRAINE T. ROBINS

1 be much easier.

2 Q. Yes, ma'am.

3 A. I took the self-billing

4 reports and put them on a spreadsheet.

5 If I am correct, I believe that we got

6 three months, the first three months,

7 half of May and then May, June, July --

8 four months all in late

9 September/October. I got them around

10 that time. Arthur gave them to me about

11 that time, after Tom told me to look at

12 it.

13 I took the sheets, the

14 self-billing reports, and made a

15 spreadsheet on each category, which would

16 be 20-foot chassis, 40-foot chassis,

17 45-foot chassis; gensets; 20-foot dry

18 vans; 40-foot reefers; and 40-foot high

19 cubes and 45-foot high cubes, and divided

20 it across with -- on the self-billing

21 reports. They had a date that they put

22 it on hire.

23 So I put the date on hire

24 and spread it across, by each month of

ESQUIRE DEPOSITION SERVICES

39

LORRAINE T. ROBINS

1 the billing. Then I started to check the
2 billings that were on the self-billing
3 report against our move histories and
4 other documents, which brought up
5 tremendous difference.

6 By this time it had to be
7 late in '02, at which time we did write
8 several, several e-mails and telephone
9 calls to Sea Star Line making them aware
10 of the discrepancies and asking them to
11 get it straightened out.

12 Q. Did you do anything else?

13 MR. MOLDOFF: Objection to
14 form.

15 THE WITNESS: What do you
16 mean anything else?

17 BY MR. ARMSTRONG:

18 Q. In connection with
19 straightening out the billing, this
20 project.

21 A. I don't really understand
22 your question. Anything else such as?

23 Q. Did you take any action,
24 other than that that you described in

ESQUIRE DEPOSITION SERVICES

40

LORRAINE T. ROBINS

1 your answer?

2 A. We sent them e-mails, we
3 reconciled out bills, we sent out bills.

4 Q. When did you last send out
5 bills to Sea Star Line?

6 A. We sent out bills -- we sent
7 the bills to our attorney and I don't
8 know when he forwarded them, but we are
9 still in the process of amending bills.

10 Once we got the documents, we found
11 several more discrepancies and we are
12 amending the bills. So it's an ongoing
13 process right now.

14 Q. When did you last send the
15 bills to your attorney?

16 MR. MOLDOFF: I object to
17 the question to the extent it
18 calls for work product.

19 BY MR. ARMSTRONG:

20 Q. When did you last send the
21 bills to your attorney.

22 A. I don't remember the time,
23 but I do believe that they were received
24 by Sea Star Line, because Andy Rooks or

ESQUIRE DEPOSITION SERVICES

41

LORRAINE T. ROBINS

1 someone called and asked if we could

2 e-mail them down to him.

3 Q. Are you talking about

4 documents that were produced in response

5 to requests for production in this

6 litigation?

7 A. No.

8 Q. When did you or Mr. Davis

9 last send bills to Sea Star Line?

10 A. I believe August of -- I

11 think in August of '04.

12 Q. You sent bills to Sea Star

13 Line in August of '04?

14 A. I believe so.

15 Q. Do you recall?

16 A. I had taken the billing,

17 which we originally started billing

18 because of discrepancies in the

19 self-billing report. Then we found

20 several other discrepancies. We did have

21 a loading manifest from the MAYAGUEZ, so

22 we sent a bill out for that.

23 We were making them A, B, C,

24 D. It ended up getting to be very

ESQUIRE DEPOSITION SERVICES

42

LORRAINE T. ROBINS

1 confusing, so in August '03, when I got a
2 report from Mr. Rooks, I decided to
3 combine all the billing, and correct the
4 mistakes, and combined all the billing in
5 categories for each unit rather than as
6 we had been doing it in the past.

7 So we canceled out all those
8 invoices and did the individual invoices.
9 So it was sometime in the period from
10 August to September of '03 that the bills
11 were sent out to Sea Star Line. I mean,
12 I would have to check the exact dates on
13 the bills. I don't recall, but it was in
14 that period. And those bills were for
15 each category of equipment.

16 Q. You referred to quote,
17 unquote, our move histories.

18 A. The ones we were working
19 with.

20 Q. Who are "our?"

21 A. When I say our move
22 histories, Arthur and I were both working
23 on them.

24 Q. But were these move

ESQUIRE DEPOSITION SERVICES

43

LORRAINE T. ROBINS

1 histories prepared by any particular
2 entity?

3 A. Yes, yes. These move
4 histories were originally prepared by
5 Holt Logistics on a program that they
6 wrote for Emerald Equipment.

7 Q. When was this program
8 written for Emerald?

9 A. I don't recall the date.

10 Q. Was it written after April
11 2002?

12 A. I don't know.

13 Q. Did you use any other move
14 histories?

15 A. What do you mean?

16 Q. Other than the Holt
17 Logistics move histories.

18 A. I use documentation.

19 Q. You referred to quote,
20 unquote, other documents. What were the
21 other documents?

22 A. There was input into the
23 computer from -- for the first three
24 weeks or so. Sea Star Line maintained

ESQUIRE DEPOSITION SERVICES

44

LORRAINE T. ROBINS

1 the Holt Logistics system, and they were
2 entering various information into the
3 system. So we used that.
4 CSX Rail electronically
5 gives Holt Logistics the movement on all
6 containers daily. Some of the truckers
7 had called in, and we got information
8 from them. It was various sources. But
9 the hard documentation was the CSX Rail,
10 things like that.

11 Q. Did you obtain any TIRs?

12 A. Packer Avenue Marine
13 Terminal, they gave us -- that was also
14 in the system, we could get the TIR
15 numbers from Holt Logistics. And when
16 GTS started On August 1st in
17 Jacksonville, we got TIRs on them on all
18 equipment that was returned to them by
19 Sea Star Line. So they are the two
20 sources of TIRs that we got.

21 Q. Did you get inventories from
22 GTS?

23 A. I got some inventories from
24 GTS, I think.

ESQUIRE DEPOSITION SERVICES

45

LORRAINE T. ROBINS

1 Q. Did you review those

2 inventories?

3 A. Absolutely.

4 Q. Did you get inventories

5 taken by JAX Port? Do you know what JAX

6 Port is?

7 A. I know what JAX Port is.

8 The only inventory that I recall from JAX

9 Port was the sand lot, which they had an

10 inventory attached to the bill. When I

11 say they, I mean Sea Star Line billed for

12 the sand lot. And attached to that sand

13 lot bill was an inventory.

14 Q. Who did Sea Star Line bill

15 for the sand lot?

16 A. I guess they billed MBC or

17 Emerald Equipment, one or the other.

18 Q. In regard to the Holt

19 Logistics system, are you familiar with

20 that system?

21 MR. MOLDOFF: Objection to

22 form. Are you talking about the

23 computer program?

24 THE WITNESS: What do you

ESQUIRE DEPOSITION SERVICES

46

LORRAINE T. ROBINS

1 mean, do I know about the system?

2 BY MR. ARMSTRONG:

3 Q. Are you familiar with how

4 the system works?

5 A. Depends on what -- there are

6 several different programs. Depends on

7 what you are talking about.

8 Q. What programs are you

9 familiar with in that system?

10 A. I'm familiar with the

11 program that they wrote for NPR, I'm

12 familiar with the Holt Company programs

13 that are there.

14 Q. Anything else?

15 A. That's it.

16 Q. Was the program written for

17 NPR, separately from the Holt Company

18 programs?

19 A. Yes.

20 Q. Do you know how it differed?

21 A. I know that the program that

22 was written for NPR was designed by

23 Shalom Cohen. And it was a very large

24 program, and they did all their billing

ESQUIRE DEPOSITION SERVICES

47

LORRAINE T. ROBINS

1 on that. He worked on that for about a
2 year, until it --

3 Q. Do you know when he worked
4 on it?

5 A. What do you mean when?

6 Well, the program was in effect when Sea
7 Star Line bought NPR. And I would say it
8 had been in effect for about a year. I'm
9 familiar with it because it made the
10 billing for the truckers much easier.

11 Q. Is it your understanding
12 that Sea Star Line retained any program,
13 other than the NPR program, in the Holt
14 system, in the Holt Logistics system?

15 A. To my knowledge, the other
16 program that they retained was the
17 logistics system that they set up for
18 NPR.

19 Q. When you say "they," whom do
20 you mean?

21 A. Holt Logistics set up for
22 NPR.

23 Q. So Sea Star Line, to your
24 knowledge, was not involved in any other

ESQUIRE DEPOSITION SERVICES

48

LORRAINE T. ROBINS

1 programs related to the Holt Logistics

2 system?

3 A. I did not think so. I don't

4 know.

5 Q. You referred to the loading

6 manifest from the MAYAGUEZ. Do you

7 recall when that loading manifest was

8 dated?

9 A. It was dated April 26th to

10 the 27th.

11 Q. Of what year?

12 A. 2002.

13 Q. How did you use the loading

14 manifest from the MAYAGUEZ?

15 A. I took the loads that were

16 on it, and I billed for those.

17 Q. Have you ever changed your

18 billing for those loads?

19 A. Yes, I have.

20 Q. When did you change your

21 billing?

22 A. Recently, because I couldn't

23 get copies of the manifests. I didn't

24 find out about the in-transit until

ESQUIRE DEPOSITION SERVICES

49

LORRAINE T. ROBINS

1 January of this year.

2 Q. This year being 2005?

3 A. No, I'm sorry, 2004. And I

4 didn't do anything on it, because I

5 didn't have the manifest, so I didn't

6 know what was in transit.

7 And recently in the

8 discovery we got a list that shows --

9 it's a Sea Star Line document that shows

10 what was in transit, where they took

11 credits against MBC Leasing, so I have

12 adjusted the billing from the containers

13 on that list for 14 days credit on each

14 unit.

15 And I would also like to

16 point out that there are a lot of

17 mistakes on that, too.

18 Q. On what?

19 A. On the document.

20 Q. On what document?

21 A. The in-transit settlement

22 with MBC on monies that were due Sea Star

23 Line for in-transit moves. I don't have

24 the Bates number on it.

ESQUIRE DEPOSITION SERVICES

50

LORRAINE T. ROBINS

1 Q. What mistakes did you find?

2 A. Taking credit for days that
3 weren't paid.

4 Q. Anything else?

5 A. That's big, pretty big.

6 Q. What is the number?

7 A. I don't have the number in
8 my head now.

9 Q. Approximately, if it's that
10 big a number?

11 A. I can't tell you. The
12 credit is thousands of dollars. But I
13 don't have it totaled.

14 Q. Any other mistakes that you
15 found, that you can recall?

16 A. No. The only mistakes that
17 I found that I was concerned with were
18 the monies. I have to take the listing
19 that they have as being correct, but the
20 credits are being issued, and that's part
21 of the amended bill that we are working
22 on.

23 Q. What listing do you mean
24 when you say the listing that they have?

ESQUIRE DEPOSITION SERVICES

51

LORRAINE T. ROBINS

1 A. I'm talking about the
2 documents that were on the Bates report.
3 I don't know what the number is. It had
4 containers that went out on the MAYAGUEZ,
5 the HUMACAO and the GUAYAMA.

6 Q. Are you talking about NPR
7 documents?

8 A. No; Sea Star documents.

9 Q. Have you ever been informed
10 that the documents relating to or listing
11 containers that went out on those three
12 ships were prepared by NPR?

13 A. What do you mean? Were they
14 prepared by NPR?

15 Q. Have you ever been informed
16 that the documents listing containers
17 that were on those three ships were
18 prepared by NPR?

19 A. I've never been informed of
20 that.

21 Q. Have you ever inquired as to
22 how those documents were prepared?

23 A. Are you talking about the
24 ship manifests?

ESQUIRE DEPOSITION SERVICES

52

LORRAINE T. ROBINS

1 Q. The documents listing the
2 containers on those three ships to which
3 you referred earlier.

4 A. No. Arthur originally
5 requested that we have manifests for
6 those vessels. We never received the
7 manifests. As a result, we could not --
8 we had to take whatever we had. But when
9 Mr. Holt had a meeting with Mr. Magee in
10 December '03, he again asked Mr. Magee
11 for the manifests. We never got the
12 manifests.

13 Q. Are you talking about the
14 manifests for those three ships?

15 A. Right.

16 Q. How do you know that Mr.
17 Holt asked Mr. Magee for the manifests
18 for those three ships?

19 A. No. He asked them for
20 manifests period.

21 Q. Not particularly for those
22 three ships?

23 A. I don't know.

24 Q. Do you know whether he asked

ESQUIRE DEPOSITION SERVICES

53

LORRAINE T. ROBINS

1 for Sea Star Line manifests?

2 A. Sea Star Line manifests.

3 Q. Do you know whether the

4 manifests for those three ships were Sea

5 Star Line manifests?

6 A. No, I do not.

7 Q. Have you ever looked at

8 them?

9 A. I have not. I've never seen

10 them.

11 Q. How did you determine what

12 equipment was on those three ships?

13 A. The only ship that I could

14 determine was the MAYAGUEZ.

15 MR. MOLDOFF: Objection to

16 form. At what time are you

17 talking about? Are you talking

18 about at any time?

19 THE WITNESS: He said those

20 three ships.

21 BY MR. ARMSTRONG:

22 Q. Go ahead and answer.

23 MR. MOLDOFF: Am I right,

24 that you are talking about at any

ESQUIRE DEPOSITION SERVICES

54

LORRAINE T. ROBINS

1 time up to the present?

2 MR. ARMSTRONG: Yes.

3 THE WITNESS: Now I am

4 completely confused.

5 BY MR. ARMSTRONG:

6 Q. How did you determine what
7 equipment was on board those three ships?

8 A. I determined that when I got
9 the documents in discovery, which I still
10 don't know if that is complete. They
11 were Sea Star Line's documents, and
12 that's what I was using.

13 Q. Did you look at the
14 documents?

15 A. I absolutely looked at those
16 documents, yes.

17 Q. And do you know who prepared
18 the documents?

19 A. I do not know. There's a
20 top line which gives you the name of the
21 ship, and it came out very dark, so I
22 don't know who prepared it. But this was
23 given to us in discovery.

24 Q. Do you know whether NPR

ESQUIRE DEPOSITION SERVICES

55

LORRAINE T. ROBINS

1 prepared those documents?

2 A. I would say no.

3 Q. You do not know?

4 MR. MOLDOFF: Wait a minute.

5 Off the record.

6 - - -

7 (Whereupon, a discussion was

8 held off the record.)

9 - - -

10 (Whereupon, the pertinent

11 portion of the record was read.)

12 - - -

13 THE WITNESS: I do not know.

14 BY MR. ARMSTRONG:

15 Q. Have you asked anyone
16 whether NPR prepared those documents?

17 A. No.

18 Q. From whom did you receive
19 the documents?

20 A. I believe I received them in
21 the discovery -- the documents from Sea
22 Star Line.

23 Q. Did any particular
24 individual give you those documents?

ESQUIRE DEPOSITION SERVICES

56

LORRAINE T. ROBINS

1 A. I don't recall how I got
2 them. I just got them a few days ago.

3 Q. A few days ago; less than
4 two weeks ago?

5 A. Yes.

6 Q. And who gave them to you?

7 A. I don't recall whether it
8 was John Evans or whether it was Arthur
9 Davis.

10 Q. Is John Evans involved in
11 this project of straightening out the
12 billing?

13 A. John is involved in
14 basically helping us get the records
15 straightened out.

16 Q. How long have you known John
17 Evans?

18 A. Thirty-some years.

19 Q. How do you know John Evans?

20 A. John came to work for Holt
21 Cargo Systems, Inc. back in about 1970,
22 the early '70s. Maybe it was late '68,
23 '69.

24 Q. What was his position with

ESQUIRE DEPOSITION SERVICES

57

LORRAINE T. ROBINS

1 Holt Cargo Systems, Inc.?

2 A. Accounting.

3 Q. Has he held other positions

4 with any of the Holt Companies?

5 A. He has held other positions

6 and I don't know. He was officer in some

7 positions, but I don't recall his

8 offices.

9 Q. Do you know what his

10 responsibilities were?

11 A. No.

12 Q. Has he ever held legal

13 positions in any of the Holt Companies?

14 A. Yes.

15 Q. What positions have those

16 been?

17 A. House counsel.

18 Q. With what company or

19 companies?

20 A. I don't know whether it was

21 Holt Cargo Systems or Holt Group, Inc., I

22 don't know.

23 Q. Do you know how long he was

24 house counsel?

ESQUIRE DEPOSITION SERVICES

58

LORRAINE T. ROBINS

1 A. No, I don't.

2 Q. Do you know when he was last
3 house counsel?

4 A. No.

5 Q. After you received these
6 documents regarding the three ships, did
7 you review them?

8 A. Yes, I did.

9 Q. And have you made any
10 changes in your claims after reviewing
11 these documents?

12 A. Yes, I have.

13 Q. What changes have you made?

14 A. I gave credit for 14 days on
15 the vessels that we had billed -- I mean
16 on the containers that we had billed.

17 Q. Did you make any other
18 changes?

19 A. No.

20 Q. And how did you determine
21 what the on-hire date was for equipment
22 on board these three vessels after you
23 gave the credit?

24 A. Do you know, I gave the

ESQUIRE DEPOSITION SERVICES

LORRAINE T. ROBINS 59

1 credit on April 29th, according to the
2 lease, but I really wanted to discuss it,
3 because I think it should have been to
4 the 27th, because they were already en
5 route.

6 Q. That wasn't my question.
7 How did you determine what the on-hire
8 date for a particular piece of equipment
9 on board one of those vessels was, after
10 you gave that in-transit credit?

11 A. I don't understand your
12 question. The billing that -- if I had
13 billing, I had already -- on the billings
14 that I had for Sea Star Line, say on a
15 40-foot container, I already had Sea Star
16 Line's date that they said they put it on
17 hire, or I had the actual date, if you
18 are familiar with the bills. And then I
19 comment as to how I came to that.

20 Now either -- that didn't
21 change. So that if it was an on-hire
22 date, in lots of instances I took Sea
23 Star Line's on-hire date, because I
24 didn't have any other information. If I

ESQUIRE DEPOSITION SERVICES

LORRAINE T. ROBINS 60

1 know the equipment was on the vessel, I

2 gave them 4/29.

3 Q. You gave them --

4 A. As an on-hire date, I gave

5 Sea Star Line 4/29 as an on-hire date. I

6 had no other information.

7 Q. If the equipment was on

8 board one of these three ships, you have

9 a 4/29 on-hire date?

10 A. Yes.

11 Q. Have you ever changed that?

12 A. I gave credit.

13 Q. What credit did you give?

14 A. I gave them credit for two

15 weeks.

16 Q. Now, did you then set the

17 on-hire date for the day after the

18 two-week credit period?

19 A. What? Pardon me?

20 Q. Correct me if I'm wrong.

21 You say that you billed beginning

22 4/29/2002 for equipment listed on board

23 these three vessels. You gave credit for

24 14 days. Did you then set the on-hire

ESQUIRE DEPOSITION SERVICES

LORRAINE T. ROBINS 61

1 date as the day after the 14-day period

2 ended?

3 A. I did if I had documentation

4 that called for it still being on hire.

5 Q. What documentation was that?

6 A. Could be a TIR, could be an

7 inventory.

8 Q. Anything else?

9 MR. MOLDOFF: Objection to

10 form.

11 THE WITNESS: Any other

12 document that I would have at that

13 particular time.

14 BY MR. ARMSTRONG:

15 Q. Was it your understanding

16 that any piece of equipment listed in an

17 inventory was on hire to Sea Star Line?

18 A. No.

19 Q. How did you determine what

20 equipment listed in inventories was on

21 hire to Sea Star Line?

22 A. Well, I only -- the only

23 inventories that I recall I had -- two

24 inventories were San Juan. One was dated

ESQUIRE DEPOSITION SERVICES

LORRAINE T. ROBINS 62

1 6/22 and one was dated 8/14. These were
2 not signed by any Emerald
3 representatives. And these were not
4 given to Emerald until sometime in 2003.
5 When I say June -- June 22nd and August
6 15th, that's '02, the year '02 on those.

7 I took the two inventories
8 and put them on an Excel sheet. And if,
9 in fact, the container -- and this was
10 only on containers -- if the container
11 was there for the 22nd of June and the
12 14th of June -- I mean the 15th of
13 August, I gave them credit to the 22nd of
14 June.

15 But in cases where it wasn't
16 on the June 22nd inventory, but it was on
17 the August 15th inventory, I gave them
18 credit for August 15th. Or in some
19 instances it was taken out again. And in
20 those instances it would be either a TIR
21 or some documentation, whichever it is.

22 But all of these things were
23 explained in the comments to our billing
24 of why we did it, how we did it, why we

ESQUIRE DEPOSITION SERVICES

LORRAINE T. ROBINS 63

1 started on a certain date. And TIR

2 numbers were given on that comments

3 section, too.

4 Q. Okay.

5 A. The other inventory I had

6 was one from Marty McDonald, which he did

7 sign for, and that was for chassis and

8 gensets. And I gave credit for that.

9 Q. How did you give credit in

10 connection with the June 22nd inventory?

11 A. I just billed it to June

12 22nd.

13 Q. So if it was on the

14 inventory, you stopped your billing as of

15 June 22nd?

16 A. That's correct.

17 Q. Did you make any inquiry as

18 to whether any of the equipment of the

19 June 22nd inventory was in storage or had

20 been in storage prior to June 22nd?

21 A. When I billed, I didn't bill

22 anything to Sea Star Line unless I had a

23 movement of some kind that they had

24 touched it. If they had it, I billed it.

ESQUIRE DEPOSITION SERVICES

LORRAINE T. ROBINS 64

1 If it didn't have any connection to Sea

2 Star Line on it, I did not bill it.

3 I mean, there are quite a

4 few in that June 22nd inventory that I

5 didn't bill because I couldn't find any

6 connection to Sea Star Line. I didn't

7 take the whole inventory and just bill

8 it.

9 Q. Are you familiar with the

10 NPR program?

11 A. What NPR program?

12 Q. The NPR program prepared by

13 Shalom Cohen.

14 A. Vaguely.

15 Q. Do you know how the NPR

16 program requires that you show taking

17 possession of a piece of equipment?

18 A. No, I don't.

19 Q. Do you know whether you have

20 to show an on hire to show that you have

21 possession of a piece of equipment under

22 that program?

23 A. No, I don't have to.

24 Q. Are you familiar with a

ESQUIRE DEPOSITION SERVICES

LORRAINE T. ROBINS 65

1 program called IQ -- you say you do not
2 have to?

3 A. I don't think you have to.

4 I don't know. I don't know the exact --
5 am I familiar with what?

6 Q. Are you familiar with a
7 program called IQ Ship?

8 A. I understand it's a program
9 that Sea Star Line uses.

10 Q. Now, with respect to the
11 August 15th inventory, how did you give
12 your credits, what procedure did you use?

13 A. If it appeared on the August
14 15th inventory and did not appear on the
15 June 22nd inventory, I used August 15th,
16 unless I had other information that the
17 container was still on hire.

18 Q. What other information would
19 that be?

20 A. Well, for one thing, a
21 container supposed to be in storage in
22 San Juan August 15th ends up with a TIR
23 coming back into Jacksonville. I think
24 that's a pretty good example.

ESQUIRE DEPOSITION SERVICES

66

LORRAINE T. ROBINS

1 Q. Coming into Jacksonville

2 after August 15th?

3 A. Mm-hum.

4 Q. Do you know whether Sea Star

5 Line moved empty equipment, that is,

6 Emerald equipment, from San Juan to

7 Jacksonville?

8 A. I'm quite sure that -- I

9 don't know what they did.

10 Q. Do you ever inquire?

11 A. No.

12 Q. Is that the procedure that

13 you followed with respect to the

14 McDonald-signed inventory?

15 A. Yes. But bear in mind, Mr.

16 Armstrong, these TIRs weren't seven days

17 later, they were months later.

18 Q. What TIRs are you

19 referencing now?

20 A. Where they were accepted

21 into Jacksonville by GTS, or that they

22 appeared on a rail car with CSX.

23 Q. Let's talk about the

24 acceptance into Jacksonville by GTS. Was

ESQUIRE DEPOSITION SERVICES

67

LORRAINE T. ROBINS

1 it your understanding that the agreement
2 between Sea Star Line and Emerald
3 required that a unit be accepted into
4 Jacksonville by GTS?

5 A. Yes, it was. After August
6 1st.

7 Q. What about before August 1,
8 2002?

9 MR. MOLDOFF: Objection to
10 form.

11 THE WITNESS: Up until then
12 there was -- GTS went to work for
13 Greenwich sometime, end of July.
14 So prior to August 1st we took or
15 I took Sea Star Line's off-hire
16 dates and used them. That is,
17 where they gave me a listing of
18 the equipment, specific numbers.

19 BY MR. ARMSTRONG:

20 Q. After August 2004, have you
21 been amending your spreadsheets?

22 A. Yes, I have.

23 Q. Has the total claim
24 increased?

ESQUIRE DEPOSITION SERVICES

68

LORRAINE T. ROBINS

1 A. I think that it probably
2 will remain about the same, because when
3 we got certain documents, we found
4 several that we have not billed. And
5 even giving the credits, just checking
6 one or two, it didn't make that much of a
7 difference.

8 Q. How did you determine what
9 units were in Sea Star Line's possession
10 as of April 27, 2002?

11 A. April 22nd?

12 Q. April 27, 2002.

13 A. I wasn't involved with it at
14 that time.

15 Q. Did you make any effort to
16 determine what units were in Sea Star
17 Line's possession as of April 27, 2002?

18 A. As I said, I was not
19 involved in it at that time.

20 Q. Did you make any effort
21 determine what units were in inland
22 depots -- and I am speaking of Emerald
23 units -- as of April 27, 2002?

24 A. I was not involved in that.

ESQUIRE DEPOSITION SERVICES

69

LORRAINE T. ROBINS

1 Q. I understand. When you
2 became involved, did you make any effort
3 to determine what Emerald units had been
4 in Sea Star Line's possession as of April
5 27, 2002?

6 A. The only thing that I
7 received was a list from Mr. Rooks dated
8 the 23rd or the 26th of July, which is a
9 list of containers or equipment that was
10 in various depots.

11 Q. When did you receive the
12 list from Mr. Rooks?

13 A. Maybe it was the end of
14 July, beginning of August '02.

15 Q. When you say depots, are you
16 referring to inland depots?

17 A. Basically they were trucking
18 companies. I guess they were depots.

19 Q. Other than that list, have
20 you made any effort, when you became
21 involved, to determine what Emerald units
22 were in Sea Star Line's possession as of
23 April 27, 2002?

24 A. I, myself, was not, as I

ESQUIRE DEPOSITION SERVICES

70

LORRAINE T. ROBINS

1 said, involved in that. But I do know
2 the only way -- the only information we
3 had -- we couldn't get the manifest and
4 we just really didn't know what they had.
5 So I relied on their self-billing
6 reports.

7 Q. Did you rely on any NPR
8 inventories?

9 A. No.

10 Q. When you became involved,
11 did you make an effort to determine what
12 Emerald equipment was held by third
13 parties as of April 27, 2002?

14 A. What do you mean by third
15 parties? Such as?

16 Q. Stevedores, repair
17 facilities.

18 A. Not that I know of. There
19 shouldn't have been any, because the
20 companies were -- the company was in
21 bankruptcy. And any of those claims
22 would have been settled in the bankruptcy
23 court.

24 Q. Did you discuss with anyone

ESQUIRE DEPOSITION SERVICES

71

LORRAINE T. ROBINS

1 whether any Emerald equipment had been
2 held by third parties as of April 27,
3 2002?

4 A. It wasn't being held, but
5 there were several places where Sea Star
6 Line needed equipment that was at
7 various -- like Thermo King and various
8 places. Could be depots.

9 Not being familiar with Sea
10 Star Line, they wouldn't take their
11 releases -- equipment had an NPR release.
12 Or we couldn't give them an NPR release,
13 because they were out of business.

14 But they would talk to me,
15 because I had done a lot of work with
16 these various truckers and depots, and
17 they knew me, and they wanted -- so I
18 would tell them, they can release it to
19 Sea Star Line or else write them, give
20 them written permission to release it.

21 Q. Did you ever become aware
22 that depots were withholding equipment
23 because of debts that they claimed were
24 owed by NPR?

ESQUIRE DEPOSITION SERVICES

72

LORRAINE T. ROBINS

1 A. No, not to my knowledge.

2 Q. Did you make an effort,
3 after you became involved, to determine
4 what equipment was being held in storage
5 at depots, speaking of Emerald equipment?

6 A. I had no knowledge that
7 equipment was being held, other than the
8 one list that I received from Andy Rooks,
9 and I know that Sea Star Line had
10 equipment at various depots.

11 Q. Did you make an effort to
12 determine, aside from your conversations
13 with Mr. Rooks, what equipment was in
14 storage at these depots, speaking of
15 Emerald equipment?

16 A. I didn't know what was in
17 storage at those depots. I didn't get
18 any information, and I wasn't under the
19 impression that they were storing
20 containers or chassis or gensets at
21 depots.

22 Q. After you became involved,
23 did you make an effort to determine what
24 equipment, speaking of Emerald equipment,

ESQUIRE DEPOSITION SERVICES

73

LORRAINE T. ROBINS

1 was being held in storage at Sea Star

2 facilities?

3 A. The inventories that I had

4 were the only inventories -- the June

5 22nd, '02, August 15th, '02, July 10,

6 '02, Marty McDonald's and the sands lot.

7 I thought I had them all.

8 Q. How did you determine what

9 equipment was in storage and what

10 equipment was in use by Sea Star Line?

11 A. Again, I have to say, I

12 would go to my documents, to the move

13 histories, to my TIRs, and determine

14 whether it was in use or not.

15 Q. Have you ever read the

16 equipment rental agreement between Sea

17 Star and Emerald?

18 A. Just sections of it.

19 Q. What sections do you recall

20 reading?

21 A. The charges, the rates, per

22 diems, redelivery.

23 MR. ARMSTRONG: Let's take a

24 break.

ESQUIRE DEPOSITION SERVICES

74

LORRAINE T. ROBINS

1 - - -

2 (Whereupon, a recess was

3 taken.)

4 - - -

5 BY MR. ARMSTRONG:

6 Q. Have you received copies of

7 TIRs after August 2004?

8 A. August 2004?

9 Q. Yes.

10 A. Yes, I have.

11 Q. And what have you done with

12 those TIRs?

13 A. I'm spreadsheeting them.

14 Q. Are you amending your

15 spreadsheets using those TIRs?

16 A. Well, since I just finished

17 entering all the TIRs that I have,

18 because we didn't get those until January

19 8, '05, so I haven't made any amendments

20 to my billing.

21 Q. Have you also prepared

22 depreciated value billings?

23 A. I had prepared billing for

24 the -- not depreciated value, it's -- the

ESQUIRE DEPOSITION SERVICES

75

LORRAINE T. ROBINS

1 value is set forth in lease for each type
2 of equipment. I have prepared those.

3 Q. And what was your procedure
4 in preparing those billings?

5 A. Any equipment that wasn't
6 returned, that was on our self-billing
7 report after the 30th of November, I
8 considered lost. There had been
9 instances where it was delivered to us
10 later and I've adjusted it.

11 Q. For purposes of preparing
12 the DV billings, you use self billings
13 reports?

14 A. What do you mean DV?

15 Q. I call it depreciated value.
16 You probably call it stipulated value.

17 A. Yes, stipulated.

18 Q. For purposes of preparing
19 those reports, you used the self-billing
20 reports to determine what equipment was
21 in Sea Star's possession?

22 A. I used the schedules and the
23 invoices I sent to Sea Star Line.

24 Q. How did you determine that

ESQUIRE DEPOSITION SERVICES

76

LORRAINE T. ROBINS

1 every piece of equipment on your
2 stipulated value billings had been in Sea
3 Star Line's possession?

4 A. If it was on --

5 MR. MOLDOFF: Objection to
6 form.

7 THE WITNESS: If it was on
8 my billings, I had already
9 determined it had been in Sea Star
10 Line's possession. Again, I show
11 in my comments on my bills how I
12 came to this conclusion.

13 BY MR. ARMSTRONG:

14 Q. I'm going to show you a copy
15 of a Schedule DV 20-foot container
16 8/23/2004, amended. I will ask the court
17 reporter to mark this as Exhibit-1 to
18 this deposition. We will call it
19 Robins-1.

20 - - -

21 (Whereupon, Exhibit Robins-1
22 was marked for identification.)

23 - - -

24 BY MR. ARMSTRONG:

ESQUIRE DEPOSITION SERVICES

77

LORRAINE T. ROBINS

1 Q. Can you identify this

2 document?

3 A. This isn't my document.

4 Q. Well, I will tell you that

5 that's a copy of the document, to my

6 knowledge, that we have, shall we say,

7 translated from hard copy to computer

8 disk, and that's a printout from the

9 disk.

10 A. This is not my copy. I

11 mean, one, my copy shows the actual days

12 that they paid. It's all -- each month.

13 MR. MOLDOFF: You are saying

14 this doesn't have the complete

15 information on it?

16 THE WITNESS: Doesn't have

17 the complete information.

18 BY MR. ARMSTRONG:

19 Q. Does it have the information

20 that is shown on there?

21 MR. MOLDOFF: Objection to

22 form. The document speaks for

23 itself.

24 THE WITNESS: Yes.

ESQUIRE DEPOSITION SERVICES

78

LORRAINE T. ROBINS

1 MR. MOLDOFF: Is there a
2 question?

3 BY MR. ARMSTRONG:

4 Q. The columns there, are those
5 columns that you utilized or did you
6 utilize different columns?

7 A. Well --

8 MR. MOLDOFF: If you know.

9 THE WITNESS: Yes, I had
10 other columns in here.

11 BY MR. ARMSTRONG:

12 Q. But the columns there that
13 are on that document --

14 A. I would have to have the
15 other document to compare it.

16 Q. Did you comment that certain
17 equipment was used as fence?

18 A. Yes.

19 Q. What do you mean by that?

20 A. When Arthur Davis was down
21 in Puerto Rico, they had built, out of
22 the containers, a fence. He called me
23 and gave me the numbers. And I think we
24 also sent an e-mail immediately to Mr.

ESQUIRE DEPOSITION SERVICES

79

LORRAINE T. ROBINS

1 Rooks about the containers being used as
2 a fence. In fact, I think a few days
3 later he went back and found another
4 fence.

5 Q. Did you expect that the
6 Emerald equipment would be stored in the
7 middle of Sea Star's terminal?

8 A. Yes, yes, I did. There were
9 supposed to be certain places they were
10 going to store it, from what I understood
11 later, but I didn't expect them to use it
12 down at the end of the terminal and build
13 a fence between them and their ships.

14 Q. Did you have a discussion
15 with anyone in Puerto Rico about that?

16 A. I spoke with Mr. Davis when
17 he was down there.

18 Q. Did you speak to anybody
19 else?

20 A. No.

21 Q. Now, when you are talking
22 about "fence" in your comments, are you
23 talking about units that are on the
24 perimeter of the terminal?

ESQUIRE DEPOSITION SERVICES

80

LORRAINE T. ROBINS

1 A. Yes.

2 Q. And based --

3 A. Or the sides.

4 Q. And based on the fact that

5 the units were on the perimeter or the

6 sides of the terminal, you determined

7 that they were being used as a fence?

8 A. No. They were being used as

9 a fence. You can tell a difference

10 between storage and a fence.

11 Q. How can you tell the

12 difference between storage and a fence?

13 A. Well, you would have to go

14 to the terminal and see.

15 Q. What terminal?

16 A. Go to the terminal in San

17 Juan or you could go -- how can I explain

18 it?

19 Q. Would you have to go to the

20 terminal in San Juan to determine whether

21 these units were in storage or used as a

22 fence?

23 A. Yes.

24 Q. Did you go to the terminal

ESQUIRE DEPOSITION SERVICES

81

LORRAINE T. ROBINS

1 in San Juan?

2 A. No, I did not.

3 Q. Have you ever visited the

4 terminal, the Sea Star terminal in San

5 Juan?

6 A. No, I haven't.

7 Q. Did you ever visit the

8 terminal in San Juan when it was an NPR

9 terminal?

10 A. No, I haven't.

11 Q. Your comment is based on

12 what Arthur Davis told you?

13 A. That's correct. He called

14 me from San Juan when he was on the pier

15 and gave me the numbers for several

16 pieces that were being used.

17 Q. Do you recall when he did

18 that?

19 A. Could have been January,

20 February '03.

21 Q. I show you a copy of a

22 document entitled Order Authorizing Sale

23 of the NPR Assets Free and Clear of All

24 Liens, Claims and Encumbrances, which has

ESQUIRE DEPOSITION SERVICES

82

LORRAINE T. ROBINS

1 been marked as Exhibit-4 to the Emerald
2 deposition.

3 Have you ever seen that
4 document before?

5 When I refer to the Emerald
6 deposition, I'm referring to the
7 deposition in which Arthur Davis appeared
8 as Emerald's designee.

9 A. No, I haven't seen this.

10 Q. Look at paragraph 13 on page
11 eight, please.

12 A. (Witness complies.)

13 Q. Has anyone ever advised you
14 of the storage requirement in the court's
15 order?

16 MR. MOLDOFF: Objection to
17 form.

18 THE WITNESS: No.

19 BY MR. ARMSTRONG:

20 Q. Has anyone ever advised you
21 of the subject matter of paragraph 13 on
22 page eight?

23 A. No.

24 Q. I'm going to show you

ESQUIRE DEPOSITION SERVICES

83

LORRAINE T. ROBINS

1 Exhibit-8 to the Emerald deposition and
2 ask you whether you recognize the
3 signature on page 17.

4 A. Nope. No, I don't.

5 Q. Let me show you Exhibit-7 to
6 the Emerald deposition and ask you
7 whether you recognize the signature.

8 A. No, I don't.

9 Q. That is on page 17?

10 A. No.

11 Q. Let me show you a copy of a
12 letter dated April 11, 2002, that has
13 been marked as Exhibit-33 to the Emerald
14 deposition. Have you ever seen that
15 letter before?

16 A. No.

17 Q. Let me show I a copy of the
18 equipment rental agreement that has been
19 marked as Exhibit-16 to the Emerald
20 deposition. Have you ever seen that
21 document before?

22 A. Yes, I have.

23 Q. When did you first see that
24 document?

ESQUIRE DEPOSITION SERVICES

84

LORRAINE T. ROBINS

1 A. I don't recall.

2 Q. What provisions in that

3 document have you reviewed?

4 A. I have reviewed the -- I

5 reviewed this, the Schedule A, which

6 gives you the lease rate, the stipulated

7 loss rate and the damage. I reviewed

8 that. And I reviewed the redelivery.

9 Q. Did you ever look at

10 paragraph one?

11 A. Yes, I've looked at that.

12 Q. Did you discuss the contents

13 of paragraph one with anyone?

14 A. This lease was signed in --

15 dated -- I don't know when it was signed,

16 because there is no date on the signature

17 page -- August '02.

18 The equipment that you are

19 talking about was already in evidence,

20 was already in use, so you couldn't get

21 interchanges on it.

22 Q. How did you determine what

23 equipment was in use on April 29th, 2002,

24 that is, in use by Sea Star?

ESQUIRE DEPOSITION SERVICES

85

LORRAINE T. ROBINS

1 A. Well, this is something that
2 we looked at six months after it had
3 already been in use. So by that time we
4 had the self-billing reports. I would
5 say June, July, August, September, four
6 to five months, took the equipment that
7 was on the self-billing list and
8 considered that in use.

9 Q. So every piece of equipment
10 on the self-billing list you considered
11 in use?

12 A. Yes.

13 Q. Did you consider any other
14 equipment in use?

15 A. Well, later on, yes. In
16 checking the self-billing reports where
17 they had a container in some instances,
18 especially if it came out of Packer
19 Avenue, we could go into the computer and
20 could tell whether it was with a chassis
21 or a container with a chassis or a
22 chassis with a container.

23 So then we would know it was
24 a double move. So we would bill the

ESQUIRE DEPOSITION SERVICES

86

LORRAINE T. ROBINS

1 container or the chassis, whichever
2 showed up with it, with a TIR going in or
3 out of the gate.

4 Q. Did you look at anything
5 else?

6 A. I looked at the vessel load
7 and discharge, on the computer, that was
8 inputted by the Sea Star personnel, and
9 if they -- they showed loads and who the
10 loads -- the customers on the loads. I
11 billed those. If I had TIRs from JAX
12 Port, I billed those.

13 Whatever information I got
14 from CSX Lines, which we received daily
15 from their electronic systems, if the
16 containers were moving on the rails, I
17 billed those.

18 Q. You were aware, were you
19 not, that the terms and conditions of the
20 equipment rental agreement cover
21 equipment in use at various times,
22 commencing April 29th, 2002. Correct?

23 MR. MOLDOFF: Objection to
24 form.

ESQUIRE DEPOSITION SERVICES

87

LORRAINE T. ROBINS

1 THE WITNESS: I was more
2 aware of the May 1 agreement where
3 they -- I think Mr. Bates, Phil
4 Bates, sent -- it was a memorandum
5 of agreement that he sent to
6 Thomas Holt, Junior, for the use
7 of the equipment.

8 So I really didn't
9 consider -- I mean this
10 paragraph -- I was working with
11 the agreement that we had with Mr.
12 Bates or that Tom Holt, Junior,
13 had with Mr. Bates.

14 BY MR. ARMSTRONG:

15 Q. When you say "this
16 paragraph" --

17 A. I didn't say "this
18 paragraph." I was working with the
19 agreement that was made by Mr. Bates with
20 Mr. Holt, Junior. Tom Holt, Junior.

21 Q. When you say "this
22 paragraph," are you talking about
23 paragraph number one?

24 A. Yes, paragraph number one I

ESQUIRE DEPOSITION SERVICES

88

LORRAINE T. ROBINS

1 didn't see until -- the first time I saw

2 it is when I got the billing structure.

3 Q. And when was that?

4 A. September or October of '02.

5 Q. After September or October

6 of '02, were you aware of paragraph

7 number one?

8 A. No, I wasn't aware of it.

9 Q. When did you become aware of

10 paragraph number one?

11 A. I just read it over. I

12 didn't -- I really didn't -- I don't know

13 when I became aware of it, to tell you

14 the truth. As I said, I remember just

15 checking on the rates and the redelivery.

16 Q. Redelivery being paragraph

17 number ten in the equipment rental

18 agreement?

19 A. Let me see. Yes.

20 Q. Would it be fair to say that

21 in preparing your billing, you did not

22 use paragraph number one of the equipment

23 rental agreement?

24 MR. MOLDOFF: Objection to

ESQUIRE DEPOSITION SERVICES

89

LORRAINE T. ROBINS

1 form.

2 THE WITNESS: In doing my

3 billing I used whatever

4 documentation I had to do the

5 billing. If I had a TIR, I used

6 it. If I had a load that was

7 discharged from a vessel and went

8 out the gate, I used that. If it

9 was on CSX Rail, I used that.

10 I did not get any TIRs from

11 San Juan until discovery. Well,

12 no, no, I'm sorry, that's wrong.

13 I got some in December.

14 BY MR. ARMSTRONG:

15 Q. Did Emerald have

16 representatives in San Juan?

17 A. Yes, they did.

18 Q. Who were those

19 representatives?

20 A. Marty McDonald and Frankie

21 Gonzalez.

22 Q. Did you ever discuss TIRs

23 with Marty McDonald?

24 A. No.

ESQUIRE DEPOSITION SERVICES

90

LORRAINE T. ROBINS

1 Q. Did you ever ask Marty

2 McDonald to get TIRs?

3 A. Well, Marty McDonald would

4 know to get TIRs. He was a steamship

5 man.

6 Q. Did you ask him to get TIRs?

7 A. No, I did not.

8 Q. How long did Marty McDonald

9 remain an Emerald representative in San

10 Juan?

11 A. I do not know the exact

12 date.

13 Q. Did you ask Frankie Gonzalez

14 to get San Juan TIRs?

15 A. I didn't, Arthur Davis did.

16 Q. How do you know that Arthur

17 Davis did?

18 A. Because he told me.

19 Q. When did he tell you that?

20 A. We started getting TIRs in

21 October of '03 and December of '03, and

22 Frankie was assigning them then. But he

23 was signing out for equipment prior to

24 that. That was part of his job.

ESQUIRE DEPOSITION SERVICES

91

LORRAINE T. ROBINS

1 Q. Did you ask him to get TIRs
2 that he had signed prior to that?

3 A. I never had any dealings
4 whatsoever with Frankie.

5 Q. Did you ask Arthur Davis to
6 ask Frankie to get TIRs that had been
7 signed prior to that?

8 A. No.

9 Q. Let me show you a copy of an
10 e-mail that's been marked as Exhibit-34
11 to the Emerald deposition. Were you
12 involved in the Emerald billing project
13 in May 2002?

14 A. No, I wasn't.

15 Q. By whom were you employed in
16 May 2002?

17 A. I was still employed by Holt
18 Group.

19 Q. What were your
20 responsibilities in connection with the
21 Emerald equipment in May 2002?

22 A. In May of 2002 I didn't have
23 any responsibilities towards it, towards
24 the Emerald equipment.

ESQUIRE DEPOSITION SERVICES

92

LORRAINE T. ROBINS

1 Q. What responsibilities did
2 you have with depots in May 2002?

3 A. None, other than I had -- I
4 didn't have any contact -- well, I had
5 contact with them, because I answered
6 some of these things for Tom. But it
7 wasn't in conjunction with Illinois
8 Auto --

9 These were all truckers and
10 people that had dealt with NPR. So Tom
11 Holt had asked me to look into it for
12 him. Tom Holt, Junior, that is. He
13 passed it on to Arthur, and Arthur passed
14 it on to me, I believe.

15 Q. Were you working for Arthur?

16 A. No.

17 Q. Why would Arthur pass it on
18 to you?

19 A. Because Arthur knew that I
20 knew these people better than he did.
21 These are all -- as I told you before, I
22 was straightening out the billing and the
23 trucking companies for NPR. Arthur was
24 working as treasurer -- was working,

ESQUIRE DEPOSITION SERVICES

A-870

93

LORRAINE T. ROBINS

1 supervising the accounts payable. And in
2 doing their statements and everything, I
3 got to know these people pretty well.
4 That's why I called.

5 Q. Have you billed Sea Star for
6 Emerald equipment located at the depots
7 listed in that e-mail for the periods
8 prior to May 10, 2002?

9 MR. MOLDOFF: If you know.

10 THE WITNESS: Well, I know
11 that I have billed Illinois Auto
12 as of May 8th, because that's when
13 I wrote a letter telling them to
14 release it to Sea Star.

15 BY MR. ARMSTRONG:

16 Q. When did you start billing
17 Fastlane?

18 A. Fastlane I only would have
19 billed if a unit was put in there by Sea
20 Star after the 27th of June or taken out
21 of there -- I mean of April. On Global,
22 I billed containers with them, because I
23 had information on their loads that they
24 were moving for Sea Star.

ESQUIRE DEPOSITION SERVICES

94

LORRAINE T. ROBINS

1 Q. When did you begin billing

2 Global?

3 A. Various bills. It depends

4 on whichever container I had information

5 on.

6 Q. Did you bill Global prior to

7 or for the periods prior to May 10, 2002?

8 MR. MOLDOFF: Objection to

9 form.

10 THE WITNESS: I would have

11 to check his bills.

12 MR. MOLDOFF: You said

13 billed Global.

14 BY MR. ARMSTRONG:

15 Q. Did you bill for equipment

16 located at Empire for periods prior to

17 May 10, 2002?

18 A. I believe so. Prior to

19 when?

20 Q. May 10, 2002.

21 A. I would have to check my

22 records on that.

23 Q. Do you recall?

24 A. I don't recall. You

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95

LORRAINE T. ROBINS

1 realize, there were a lot of containers
2 moving around.

3 Q. Let me show you a copy of a
4 document that's been marked Exhibit-35 to
5 the Emerald deposition. Do you recognize
6 that?

7 A. I remember -- I don't
8 recognize it, but I remember that they
9 had to have -- they had some sort of a
10 legal question they wanted settled.

11 Q. Did you bill for equipment,
12 Emerald equipment, located at Illinois
13 Auto prior to May 13, 2002?

14 A. I billed for it from May
15 8th, the day that I released it. I sent
16 a letter to Illinois Auto and a copy to
17 Sea Star, releasing the equipment.

18 And the other was a problem
19 that they had to give them some sort
20 of -- I don't know whether it was
21 insurance or what have you. But I do
22 have a letter that I released it on May
23 8th. So I billed from Illinois Auto on
24 May 8th.

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96

LORRAINE T. ROBINS

1 Q. Let me show a copy of
2 e-mails which I will ask the court
3 reporter to mark as Exhibit-2 for
4 identification.

5 - - -

6 (Whereupon, Exhibit Robins-2
7 was marked for identification.)

8 - - -

9 BY MR. ARMSTRONG:

10 Q. You were aware, as of May
11 13th, that Illinois Auto was refusing to
12 release equipment?

13 A. Mm-hum, yes.

14 Q. Did you change your billing
15 to Sea Star?

16 MR. MOLDOFF: I object.

17 THE WITNESS: I don't know.

18 I remember the first part. I

19 would have to check it.

20 BY MR. ARMSTRONG:

21 Q. You were aware, on May 13th,
22 that Global and Fastlane were still
23 refusing to release equipment?

24 MR. MOLDOFF: Objection to

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97

LORRAINE T. ROBINS

1 form.

2 BY MR. ARMSTRONG:

3 Q. Correct?

4 A. No, that is not correct.

5 Q. Did you ever become aware

6 that Global and Fastlane were refusing to

7 release equipment to Sea Star?

8 A. I became aware that Global

9 was -- Sea Star was using Global Lines as

10 a carrier, and they were using our

11 equipment in early May.

12 Q. How did you become aware of

13 that?

14 A. In error, they sent me all

15 their invoices, to Sea Star.

16 Q. What is Global Lines?

17 A. Global Intermodal Service.

18 Q. And those invoices pertain

19 to Emerald equipment?

20 A. Yes. And they showed

21 containers, they showed the loads.

22 Q. I show you a copy of a

23 document which I have asked the court

24 reporter to mark as Exhibit-3 to this

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98

LORRAINE T. ROBINS

1 deposition.

2 - - -

3 (Whereupon, Exhibit Robins-3

4 was marked for identification.)

5 - - -

6 BY MR. ARMSTRONG:

7 Q. Do you recognize that?

8 A. Well, when I got the bills

9 from Global, and we called them to tell

10 them that they were wrong, that he had --

11 I think he billed them to NPR and he had

12 to bill them to Sea Star, and the same

13 thing with Fastlane's, then they wanted

14 us to send a letter that it was okay to

15 release to Sea Star Line.

16 Q. Did you send that letter?

17 A. I asked Bill Streich to send

18 that letter.

19 Q. Who is Bill Streich?

20 A. He was the -- I guess the

21 chief financial officer for the Holt

22 Group, Inc. That was his title.

23 Q. Did Bill Streich send that

24 letter?

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99

LORRAINE T. ROBINS

1 MR. MOLDOFF: Objection to
2 form.

3 THE WITNESS: As far as I
4 know, he did.

5 BY MR. ARMSTRONG:

6 Q. Let me show you a copy of a
7 May 17, 2002 document that's been marked
8 as Exhibit-31 to the Emerald deposition.
9 Have you seen that document before?

10 A. I don't recall having seen
11 this before.

12 Q. Do you recognize the
13 handwriting on the second page?

14 A. Yes, mine.

15 Q. What was your purpose in
16 writing on the second page?

17 A. I don't know. I don't
18 remember.

19 Q. Did you and Mr. Davis have
20 any communications regarding sending a
21 note to Sea Star, in connection with CSX?

22 MR. MOLDOFF: Objection to
23 form.

24 THE WITNESS: I'm looking at
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100

LORRAINE T. ROBINS

1 a note to Mr. Rooks from Arthur

2 Davis. That's all I know about

3 it. I don't recall what my -- I

4 think these dates must be the

5 dates that they went in or out. I

6 don't know.

7 BY MR. ARMSTRONG:

8 Q. Do you know why Mr. Davis

9 would send a note to Mr. Rooks with

10 respect to CSX transactions that occurred

11 prior to April 27, 2002?

12 A. Well, I'm reading this and

13 it says --

14 MR. MOLDOFF: Don't

15 speculate.

16 THE WITNESS: I'm not. I

17 think the memo speaks for itself.

18 BY MR. ARMSTRONG:

19 Q. Do you think Mr. Davis was

20 trying to bill Mr. Rooks for those CSX

21 moves?

22 MR. MOLDOFF: Objection to

23 form.

24 THE WITNESS: I do not think

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